

No. 24-1761

---

IN THE UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT

---

IN RE ROCK SPRINGS DRIVE LLC,  
*Petitioner*

---

From the United States District Court for  
the District of Maryland  
Civil Action 8:20-cv-01502

---

**PETITIONER ROCK SPRINGS DRIVE LLC’S MOTION FOR LEAVE  
TO FILE REPLY IN SUPPORT OF  
EMERGENCY PETITION FOR MANDAMUS**

---

Petitioner Rock Springs Drive LLC (RSD) files this Motion for Leave to File Reply in Support of Emergency Petition for Mandamus respectfully moving this Court for leave to file a 4-page Reply to Respondent Rock Spring Plaza II, LLC’s Answer in Response to Rock Springs Drive LLC’s petition. This Reply is necessary to address new legal arguments not raised by Respondent in the district court below and to correct factual misstatements.

A copy of RSD’s proposed Reply is attached as Exhibit A.

Dated: August 22, 2024

Respectfully submitted,

/s/ Sara E. Kropf

Sara E. Kropf, Esq.  
KROPF MOSELEY PLLC  
1100 H Street NW, Suite 1220  
Washington, DC 20005  
(202) 627-6900  
sara@kmlawfirm.com

**CERTIFICATE OF COMPLIANCE**

This answer complies with the typeface and type-style requirements of the Federal Rules of Appellate Procedure because it has been prepared in a proportionately spaced typeface using Microsoft Word for Office 365 in 14-point Times New Roman font and contains 77 words.

Dated: August 22, 2024

/s/ Sara E. Kropf

Sara E. Kropf, Esq.

**CERTIFICATE OF SERVICE**

I certify that on the 22nd day of August 2024, a copy of this motion and exhibit were sent by overnight mail to:

The Honorable Peter J. Messitte  
United States Courthouse  
6500 Cherrywood Lane, Suite 475  
Greenbelt, MD 20770

On this day, a copy of this petition was served electronically on all counsel of record.

/s/ Sara E. Kropf  
Sara E. Kropf, Esq.